



Miss Sarah-Jane McCreton
Principal's Personal Assistant
St Aloysius College
47 Upper Pitt Street Kirribilli 2061

21 December 2021

Dear Miss McCreton

**St Aloysius College - Rozelle Campus (SSD-27208140)
Response to Submissions**

The exhibition of the development application including the Environmental Impact Statement for the above proposal ended on 16 December 2021. All submissions received by the Department during the exhibition of the proposal are available on the Department's website at:

<https://mpweb.planningportal.nsw.gov.au/major-projects/project/42751>

The Department requires that you provide a response to the issues raised in the submissions, in accordance with clause 82(2) of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation).

Please note that Sydney Water and Ausgrid are yet to provide a response in relation to the application. Any comments or requirements received from these authorities will be forwarded upon receipt. In addition to the issues raised in the submissions, the Department has raised a number of key issues to be addressed (refer **Attachment A**).

The written response must be in the form of a submissions report that has been prepared having regard to the *State Significant Development Guidelines (2021)*. The *Preparing a Submissions Report Guideline* forms part of the SSD Guidelines (Appendix C). You are requested to provide the Department with a response to the submissions within two months by progressing the application on the major projects planning portal <https://majorprojects.planningportal.nsw.gov.au/>.

Note that the time between the date of this letter and the date the Secretary receives your response are not included in the period of 'deemed refusal', under clause 113(7) of the Environmental Planning and Assessment Regulation 2000.

If you have any questions, please contact Nima Salek, Planning Officer on (02) 92746088 or via email at Nima.Salek@dpie.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink that reads 'A. Coomar'.

Aditi Coomar
A/Director, Social and Infrastructure Assessments
as delegate for the Planning Secretary

Enclosed: Attachment A

Attachment A

1. Traffic and Transport and parking

- The Department has reviewed the submitted a Transport and Accessibility Impact Assessment (TAIA) and agrees with the concerns raised by Transport for NSW and Inner West Council in relation to the overall traffic generation, inadequacies of the drop-off/pick-up zones and subsequent impacts on the on-street parking. Consequently, the Department requests that you comprehensively address all of these matters and those raised in the community submissions.
- Additionally, the Department notes that the traffic and on-street parking surveys were conducted during COVID-19 lockdown period on 7 October 2021. Therefore, the results may not reflect the usual amount of traffic and available on-street parking. The Department considers that the traffic surveys should be re-conducted due to this reason and the TAIA amended accordingly.
- The EIS does not include any details of the use of the ground floor of 2A-2B Gordon Street, nor does it indicate how many parking spaces would be required to cater for the other uses within the site including the church use. The TAIA also does not assess how the overall car parking area would operate with the concurrent uses on the site and whether the available car parking spaces are sufficient to cater for all of the uses within the site. Consequently, the Department requests that you submit a parking layout plan and mark the nominated parking spaces for the proposed development as well as all of the other uses within the site.

2. Noise

- The site at 48 Victoria Road adjoins a busy road. However, the submitted Acoustics Report does not predict the acceptable noise level for the students using the outdoor play on this site adjoining the busy road. You should amend the Acoustic Report to assess the adverse impacts that students will experience in this open space as a result of the traffic noise along Victoria Road. Should the report conclude that the impacts are unacceptable, then additional noise mitigation measures and barriers may be required and must be outlined in the response to submissions.
- The noise surveys in the Acoustic Report does not consider the uses on the eastern side of 2A and 2B Gordon Street to be sensitive users, although the Department notes that a number of residences are located in this year. You should provide a clear reason as to why these areas have not be added as sensitive receivers and amend the report to include an appropriate assessment of all affected noise sensitive receivers.

3. Details of development

- The application seeks approval to relocate 200 students from St Aloysius Kirribilli campus to Rozelle, during ongoing construction works within that campus. However, the EIS does not specify whether a time limited approval for the use of the site as a school, is sought for. This is crucial to the assessment of the application, given, a long-term use of the site as a school would have several other implications that may otherwise not be experienced in a short-term or temporary use. In this regard, all of the following matter need to be clarified:
 - whether you seek approval for a time limited (temporary) or permanent development consent for the use of both the sites as a school.
 - the age group of the students to be catered for in the campus noting that the drop-off/pick-up operations as well as public transport requirements would vary significantly for primary and high schools. The TAIA should be amended to reflect the impacts of the use of the campus considering the specific age group.
 - details of community events and miscellaneous activities beyond proposed operation hours, noting that the EIS and the TAIA state that there would be after hour use of the premises with no supporting assessment provided.

- consideration of the cumulative impacts of all of existing uses within 2A-2B Gordon Street in conjunction with the proposed new use (in terms of noise, traffic, safety etc).
- whether any before or after care operations are included, if primary school students are accessing this campus at Rozelle.

4. Operational Management Plan (OMP)

- The submitted OMP dated October 2021 is in draft format and is not accepted. You must submit a revised preliminary OMP addressing the following matters:
 - implementation of the acoustic report recommendations (such as restricting the play times to 2 hours per day).
 - details of management measures to ensure safe student movements between the two sites and/or from/ to the drop-off and pick-up areas on the street (location of which are currently unknown)/.
 - details of waste generation estimation and waste storage areas within the site as well as timing of collection of waste to avoid conflict with the users of the site.

5. Building Code of Australia (BCA) Assessment and Access Report

- Level 1 of the site at 2B Gordon street has been identified as class 5 building in the submitted BCA assessment. The Access report considers the use to be for office purposes and staff room. However, according to the EIS and architectural plans, Level 1 of 2B Gordon street would be used as classrooms. Noting this significant discrepancy, the Department requires to you submit an amended BCA Assessment and Access Report to be consistent with the EIS.
- A detailed assessment of the proposal against all relevant deemed to-satisfy provisions of the BCA has been provided within Annexure D of BCA Assessment report. As the proposal is located on two separate sites, you are requested to provide two separate assessments for each building in an amended BCA Assessment report.

The amended BCA Assessment report must address BCA compliance requirements and impacts on heritage items/ conservation areas (if any).

6. Crime Prevention through Environmental Design (CPTED)

- Please provide further information on how other operations access to the sites will be limited to ensure that non-school personnel do not have access to the school premises.

7. Community engagement

- The EIS engagement overview indicates that the community engagement plan for the Rozelle community has not captured the affected community on the north side of Victoria Road. Further community engagement is required to provide opportunities to the community to collaborate on the proposed development.
